



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. H. R. McCollum
Manager, Environmental Control
U.S. Steel, Clairton Works
400 State Street
Clairton, PA 15025-1855

Dear Mr. McCollum:

As you may recall, a 2-hour venting of unburned raw COG to the open air at coke oven battery No.20 and extended flaring of raw COG at the rest of Clairton's batteries occurred on October 4, 1994. Battery No.20 flare failed to ignite because the pilot light was out. Consequently, for 2 hours unburned raw COG was continuously vented into the atmosphere. Those violations resulted in excessive emissions of H₂S, SO₂, and HCN, as well as other hazardous air pollutants inherently associated with combustion of undesulfurized COG.

On November 24, 1994, the flare ignitor pilot lights were out on batteries Nos. 13, 14 and 15 for a duration of approximately 2.5 hours. As of today, numerous occurrences of temporary lost of pilot lights at different flare systems throughout the facility were reported by USX Clairton in its Breakdown Reports to EPA and ACHD. This is viewed by EPA as an evidence that the problem with pilot lights has not been adequately addressed and continues to present an environmental hazard.

As a reflection of EPA concern over violations of certain provisions under 40CFR Part 63, Subpart L and Article XX of the Allegheny County SIP, a NOV was issued on December 1, 1994 to USX Corporation. As per USX's request, a telephone conference concerning the NOV (with EPA, ACHD and USX participation) was held on January 26, 1995. During the conference call, the causes of, and response to, the October 4, 1994 venting incident were discussed in-depth. USX stated during the conference call that it would provide EPA and Allegheny County with a copy of USX consultant's report on the venting incident and recommendations for necessary modifications and improvements to the Clairton's ignitor pilot systems. USX indicated that the Report was expected to be completed in four to six weeks and ready for distribution by early to mid-March.

In your letters to Michael Ioff of EPA and Roger Westman of ACHD, dated March 27, 1995, you indicated that completion of the Report has been for various reasons delayed and that the final document will be ready by mid-May. The letter also provided a description of the two interim steps undertaken by the facility in an attempt to increase the reliability of the systems.

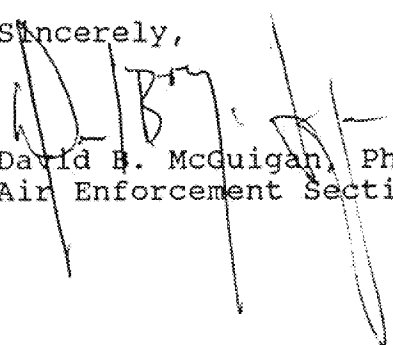
As of today, August 22, 1995, neither EPA nor ACHD have received the Report. It appears that the ignitor systems prone to failure continue to operate throughout the facility. To aggravate the situation, it is not clear at this point how much time it would take to implement the recommendations of the consultant (ChemTech).

Please be advised that EPA expects to receive by September 15, 1995, (a) a copy of the final Report, and (b) the scope of work and a schedule for implementation of the Report's recommendations.

Please note that EPA reserves its right to pursue additional enforcement actions to address the violations described in the NOV of December 1, 1995, as well as violations that occurred after the date of the issuance of NOV.

Should you have any questions, please contact Michael I. Ioff, of my staff, at (215) 597-9858.

Sincerely,


David B. McGuigan, Ph.D., Chief
Air Enforcement Section

CC: Dr. Roger C. Westman, ACHD

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Sincerely,

David B. McGuigan, Ph.D., Chief
Air Enforcement Section

CC: Dr. Roger C. Westman, ACHD

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